

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth and HTA.**

ORDER GRANTING THREE HUNDRED TWENTIETH OMNIBUS OBJECTION
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO
RICO HIGHWAYS AND TRANSPORTATION AUTHORITY TO CLAIMS ASSERTING
LIABILITIES FOR BONDS SOLD BY CLAIMANTS

Upon the *Three Hundred Twentieth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to Claims Asserting Liability for Bonds Sold by Claimants* [ECF No. 16646] (the “Three Hundred Twentieth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (“Commonwealth”)

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Twentieth Omnibus Objection.

and the Puerto Rico Highways and Transportation Authority (“HTA,” and together with the Commonwealth, the “Debtors”), dated April 30, 2021, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth or HTA, as more fully set forth in the Three Hundred Twentieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Twentieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Twentieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the Debtors are not liable for each of the claims identified in Exhibit A to the Three Hundred Twentieth Omnibus Objection (collectively, the “Claims to Be Disallowed”); and the Court having determined that the relief sought in the Three Hundred Twentieth Omnibus Objection is in the best interests of the Commonwealth, HTA, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Twentieth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Three Hundred Twentieth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Twentieth Omnibus Objection is GRANTED
as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their
entirety; and it is further

ORDERED that Prime Clerk is authorized and directed to delete the Claims to Be Disallowed from the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 16646 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Three Hundred Twentieth Omnibus Objection

Three Hundred and Twentieth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	NOREEN WISCOVITCH RETIREMENT PLAN (NW PLAN) NOREEN WISCOVITCH-RENTAS, TRUSTEE PMB 136 400 CALLE JUAN CALAF SAN JUAN, PR 00918	10/9/2019	17 BK 03283-LTS	Commonwealth of Puerto Rico	171656	\$ 25,219.50
Reason: Claimant asserts liabilities associated with mutual funds that claimants held at one time, but subsequently sold. Because claimant sold the mutual funds they purport to assert, they no longer have any right to payment from the Commonwealth in respect of bonds issued by the Commonwealth and accordingly, have no claim against the Commonwealth for alleged unpaid interest and/or loss on investment.						
2	PETER COLLOTTA & DARLA WITMER PO BOX 594 STOWE, VT 05672	4/30/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	9642	\$ 72,793.00
Reason: Claimant asserts liabilities associated with bonds issued by the Commonwealth, the Puerto Rico Infrastructure Financing Authority (PRIFA), and the Puerto Rico Public Buildings Authority (PBA) that claimants held at one time, but subsequently sold. Because claimant sold the bonds they purport to assert, they no longer have any right to payment from the Commonwealth in respect of bonds issued by the Commonwealth and accordingly, have no claim against the Commonwealth for alleged unpaid interest and/or loss on investment.						
3	ROMERO LOPEZ, LUIS R P.O. BOX 577 ISABELA, PR 00662	5/2/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	9426	\$ 3,605,475.50
Reason: Claimant asserts liabilities associated with bonds issued by the Commonwealth, the Puerto Rico Aqueduct and Sewer Authority (PRASA), the Puerto Rico Industrial Development Company (PRIDCO), the Puerto Rico Public Buildings Authority (PBA), and the Puerto Rico Government Development Bank (GDB) that claimants held at one time, but subsequently sold. Because claimant sold the bonds they purport to assert, they no longer have any right to payment from the Commonwealth in respect of bonds issued by the Commonwealth and accordingly, have no claim against the Commonwealth for alleged unpaid interest and/or loss on investment.						
4	SANDRA K CHANG TRUST SANDRA K CHANG 2500 KALAKAUA AVE STE 2105 HONOLULU, HI 96815	5/30/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	44473	\$ 25,908.13
Reason: Claimant asserts liabilities associated with bonds issued by the Puerto Rico Highways and Transportation Authority (HTA), including insured notes by the issuer, that claimants held at one time but subsequently sold. Because claimant sold the bonds they purport to assert, they no longer have any right to payment from the Puerto Rico Highways and Transportation Authority in respect of bonds issued by the Puerto Rico Highways and Transportation Authority and accordingly, have no claim against the Puerto Rico Highways and Transportation Authority for alleged unpaid interest and/or loss on investment.						
						TOTAL \$ 3,729,396.13